

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMIRI CURRY, individually and on behalf of )  
all others similarly situated, )

Plaintiff,

V.

J.P. MORGAN CHASE & CO.; CHASE  
INVESTMENT SERVICES CORP.; and DOES  
1 through 10, inclusive,

Defendants.

Case No. 07-C-6149

Judge Charles R. Norgle

Magistrate Judge Schenkier

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendants, by their attorneys, move for an extension of time to answer or otherwise plead. In support of the Motion, Defendants state as follows:

1. On October 31, 2007, Plaintiff Amiri Curry (“Plaintiff”), individually and on behalf of all other similarly situated, filed a Complaint against Defendants in Northern District of Illinois, Eastern Division, Case No. 07-C-6149 (the “Complaint”). On November 1, 2007, the registered agent of both JPMorgan Chase Bank, N.A. and Chase Investment Services Corp. was served with the Summons and Complaint.

2. Defendants have recently retained Morgan, Lewis & Bockius, LLP as counsel in this matter.

3. Because they have recently been retained and due to the advent of the Holiday season, counsel requires additional time to investigate the allegations contained in Plaintiff's Complaint.

4. Accordingly, Defendants request an additional 60 days, or until January 22, 2007, to answer or otherwise plead in response to Plaintiff's Complaint.

5. Plaintiff's counsel has been contacted and has no objection to the 60-day extension.

6. A 60 day extension of time will not cause excessive delay in the litigation and will not unduly prejudice any party.

WHEREFORE, Defendants respectfully request the Court grant their Unopposed Motion for an Extension of Time To Answer or Otherwise Plead.

Respectfully submitted,

JPMORGAN CHASE BANK, N.A.  
AND CHASE INVESTMENT  
SERVICES CORP

By: s/ Lucy Schwallie  
One of Their Attorneys

Sari M. Alamuddin  
Lucy Schwallie  
Morgan, Lewis & Bockius, LLP  
77 West Wacker Drive, 5th Floor  
Chicago, IL 60601  
Telephone: (312) 324-1000  
Facsimile: (312) 324-1001

Dated: November 16, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2007, I electronically filed the foregoing Unopposed Motion for an Extension of Time To Answer or Otherwise Plead and Proposed Order with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

**Joseph H. Meltzer**

**Robert W. Biela**

**Robert J. Gray**

Schiffirin, Barroway, Topaz & Kessler, LLP  
280 King of Prussia Road  
Radnor, PA 19807  
(610) 667-7706

**Gerald D. Wells, III**

Schiffirin & Barroway, LLC  
Three Bala Plaza East  
Suite 400  
Bala Cynwyd, PA 19004-3481  
(610) 667-7706

**Marvin Alan Miller**

**Matthew E. Van Tine**

Miller Law LLC  
115 South LaSalle Street  
Suite 2910  
Chicago, IL 60603  
312-332-3400  
(312) 676-2676 (fax)

By: s/ Lucy Schwallie